

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MOBILITY WORKX, LLC ,

Plaintiff,

v.

ERICSSON, INC.

Defendant.

Case No. 4:24-CV-000796-ALM

JURY TRIAL DEMANDED

MOBILITY WORKX, LLC ,

Plaintiff,

v.

NOKIA CORP. ET AL.

Defendants.

Case No. 4:24-CV-000797-ALM

JURY TRIAL DEMANDED

MOBILITY WORKX, LLC ,

Plaintiff,

v.

SAMSUNG ELECS. CO., LTD. ET AL.

Defendants.

Case No. 4:24-CV-000798-ALM

JURY TRIAL DEMANDED

MOBILITY WORKX, LLC ,

Plaintiff,

v.

CISCO SYSTEMS, INC.

Defendant.

Case No. 4:24-CV-000799-ALM

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND SCHEDULING ORDER

Plaintiff Mobility Workx, LLC (“Plaintiff”) and Defendants Ericsson Inc., Nokia Corporation, Nokia Solutions and Networks Oy, and Nokia of America Corporation, Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Cisco Systems, Inc. (together, “Defendants”) (collectively, “the Parties”) file this Joint Motion to Amend Scheduling Order and would show the Court as follows:

Pursuant to the Court’s Scheduling Order entered in each of these related matters, the deadlines for the Parties to: (1) exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112 is May 22, 2025, (2) exchange privilege logs is May 27, 2025, and (3) exchange preliminary proposed constructions and extrinsic evidence is June 11, 2025. The parties respectfully request that the Court extend the deadlines as follows: (1) exchange proposed terms for construction up to and including June 10, 2025, (2) exchange privilege logs up to and including October 27, 2025, and (3) exchange preliminary proposed constructions and extrinsic evidence up to and including June 24, 2025.

The Parties represent that good cause exists for the above-requested extensions. The deadline for Defendants to comply with this Court’s Order regarding service of their P.R. 3-3 and 3-4 invalidity contentions and document production is June 3, 2025. Extending the deadlines

to (1) exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112 and (2) exchange preliminary proposed constructions and extrinsic evidence is appropriate because it will afford Plaintiff adequate time to review Defendants' P.R. 3-3 and 3-4 invalidity contentions and document production prior to exchanging Plaintiff's proposed terms and preliminary constructions. Additionally, because this case is in the early stages, the Parties have conducted limited discovery. Extending the deadline to exchange privilege logs will ensure that the Parties have sufficient time to conduct thorough discovery and to prepare and exchange comprehensive privilege logs.

The Parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. No other case deadlines will be affected by this Motion. Counsel for Defendants met and conferred with counsel for Plaintiff to discuss the substantive relief sought in this Motion. The Parties are jointly seeking the relief sought herein.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion and modify the below deadlines as follow:

Original Deadline	Amended Deadline	Event
May 22, 2025	June 10, 2025	Parties to exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112, ¶ 6 (P.R. 4-1).
May 27, 2025	October 27, 2025	Privilege Logs to be exchanged by parties (or a letter to the Court stating that there are no disputes as to claims of privileged documents).
June 11, 2025	June 24, 2025	Parties to exchange preliminary proposed claim construction and extrinsic evidence supporting same (P.R. 4-2).

Dated: May 15, 2025

Respectfully submitted,

/s/ Daniel B. Ravicher

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel of the Parties have met and conferred to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(h). The Parties are jointly seeking the relief sought in this Motion.

/s/ Daniel B. Ravicher
Daniel B. Ravicher

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served on this May 15, 2025 with a copy of this document via the Court's CM/ECF system.

/s/ Daniel B. Ravicher
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